

1 JAIDEEP VENKATESAN, SBN 211386  
jvenkatesan@be-law.com  
2 PETER SOSKIN, SBN 280347  
psoskin@be-law.com  
3 BERGESON LLP  
111 N. Market Street, Suite 600  
4 San Jose, California 95113  
Telephone: (408) 291-6200  
5 Facsimile: (408) 297-6000

6 Attorneys for Defendants  
SECRET WATERFALL LLC,  
7 LAUNCELOT A. DEVAULT, AND  
TARAH A. UHRICH

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION  
11

12 RAINBOW S.p.A.,  
13 Plaintiff,

14 v.

15 SECRET WATERFALL LLC,  
16 LAUNCELOT A. DEVAULT,  
17 TARAH A. UHRICH, STARLINE  
MEDIA, INC., AND DAVID  
NDALAMBA,

18 Defendant.  
19

Case No. 5:25-0597-MRA(DTBx)

**DEFENDANTS' STATEMENT  
REGARDING PLAINTIFF'S  
MOTION FOR LEAVE TO AMEND  
COMPLAINT**

Judge: Hon. Monica Ramirez Almadani  
Crtrm.: 10B

1 Defendants Secret Waterfall LLC, Launcelot A. Devault, and Tarah Uhrich  
2 (collectively “Secret Defendants”) hereby submit the following statement regarding  
3 Plaintiff’s Motion for Leave to Amend Complaint (Dkt. 28).

4 Secret Defendants do not, in principle, oppose Plaintiff’s motion for leave to  
5 file a Third Amended Complaint. Dkt. 28. In filing this statement, Secret Defendants  
6 do not waive any defense or their right to challenge the sufficiency of the pleadings  
7 themselves.

8 Plaintiff’s proposed Third Amended Complaint, however, contains 1,350  
9 paragraphs, and is 380 pages long. Dkt. 28-1. The proposed Third Amended  
10 Complaint contains 72 counts, including 66 counts of copyright infringement  
11 relating to separate copyrights. *Id.* In view of the number of counts and copyrights at  
12 issue, Secret Defendants respectfully request forty-five days to respond to Plaintiff’s  
13 Third Amended Complaint.

14  
15  
16 Dated: November 10, 2025

BERGESON LLP

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19 By: /s/ Jaideep Venkatesen  
Jaideep Venkatesan

20 Attorneys for Defendants  
21 SECRET WATERFALL LLC,  
22 LAUNCELOT A. DEVAULT, AND TARAH  
23 A. UHRICH  
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